



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MJB
F. #2019R01483

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 9, 2020

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Aaron Weinreb
Criminal Docket No. 20-006 (BMC)

Dear Judge Cogan:

The government respectfully submits this letter to provide a status update and to request an approximate one-week adjournment of the continued violation hearing and status conference scheduled for November 10, 2020, to a date and time convenient to the Court. Due to a delay in receiving records that are likely relevant to the continued violation hearing, the government submits that a continuance is in the interest of justice so the Court and the parties have all necessary information regarding the hearing. Mr. Weinreb's attorneys have informed the undersigned that their client consents to the continuance and that Mr. Weinreb specifically consents to the exclusion of time, for Speedy Trial purposes, until the next court date.

On November 6, 2020 I was informed that JP Morgan Chase ("the Bank") possessed two recorded telephone calls that are likely relevant to the defendant's violation hearing. As of this filing, the government has not heard the recordings. Today, November 9, 2020, I spoke with a "unit lead" representative from the Bank and was informed that the two recordings were burned to a disc and would be mailed to the government from Indianapolis, Indiana. I was further informed that, due to constraints imposed by the pandemic, the recordings could not be emailed or sent in any format other than on a disc through the mail.

Since neither the Court, nor the parties, are currently in possession of all the records pertinent to the violation hearing, the government respectfully requests that the violation hearing be adjourned for approximately one week and that the time be excluded, for Speedy Trial purposes, on consent of the defendant. The government submits that the adjournment is in the interest of justice and will allow JP Morgan Chase to fully provide all the necessary records, which, in turn, will aid the government's due diligence efforts and permit the parties to effectively prepare for the continued violation hearing.

Respectfully submitted,

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